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*Attorneys for Plaintiffs Reliable Trucking Group, Inc.  
and John Walter*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

RELIABLE TRUCKING GROUP, INC.  
AND JOHN WALTER,

Plaintiffs,

-vs-

SYLVAIN "FRANK" CHOUEN,  
GREGORY MEJIA, THE ROUTE  
STORE, and ACZA TRUCKING, LLC,

Defendants.

Civil Action No. 2:24-CV-8619

**STIPULATION AND NOTICE OF  
DISMISSAL UNDER FED. R. CIV. P.  
41(a)(1)(A)**

WHEREAS, the plaintiffs filed this action on August 21, 2024;

WHEREAS, the defendants have not filed responsive pleadings or motions, but have attended telephone conferences before Magistrate Judge Almonte;

WHEREAS, during the latest court conference, the defendants indicated that they would file motions to compel arbitration under agreements they have with plaintiffs;

WHEREAS, in order to avoid motion practice, the parties have agreed to arbitrate this dispute before the American Arbitration Association in New York County, New York under the AAA Commercial Arbitration Rules;

NOW, THEREFORE, the parties stipulate under Fed. R. Civ. P. 41(a)(1)(A) as follows:

1. The parties hereby agree to submit all claims and defenses that could have been brought in this court to arbitration administered by the American Arbitration Association under its Commercial Arbitration Rules in New York County, New York. The parties further agree

that the controversy shall be submitted to one arbitrator. The parties will faithfully observe this agreement and the AAA rules, and will abide by and perform any award rendered by the arbitrator, and that a judgment of any court having jurisdiction may be entered on the award; and

2. Plaintiffs hereby dismiss their complaint.

Dated: January 29, 2025

**LAW OFFICE OF ALEXANDER SCHACHTEL LLC**      **THE LAW OFFICE OF JOHN F. OLSEN, LLC**

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/s/ Sylvain Chouen  
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